



POLLUTION PREVENTION & THE BOTTOM LINE

MARCH 1998

WORDS & WISDOM FROM THE NEW ENGLAND ENVIRONMENTAL ASSISTANCE TEAM

CHEMICAL INDUSTRY PILOT PROJECT UNDERWAY

EPA's New England regional office has launched a pilot project to help the chemical manufacturing and chemical preparations industries improve their environmental performance. The project focuses on facilities in Connecticut, Massachusetts and Rhode Island with SIC Code 2869 (Organic Chemical Manufacturing, not elsewhere classified) and SIC Code 2899 (Chemical Preparations, not elsewhere classified).

Between February and September 30, 1998, EPA's New England regional office will offer compliance assistance and incentives to encourage this sector to audit environmental compliance and to pursue cost-effective pollution prevention opportunities. Facilities may be able to save money and ensure compliance by taking advantage of new EPA policies that reduce penalties for self-disclosed violations.

The project has three phases:

Compliance Assistance: Four compliance assistance workshops focusing on EPCRA were held in February. Additional workshops are scheduled for April, May and June. Facilities participating in the project will receive periodic mailings, including fact sheets on key regulatory issues and invitations to participate in workshops.

Incentives for Self-Auditing: To give firms time to audit their operations and come into compliance, EPA's New England office and the states will not emphasize this sector for inspections until October 1, 1998. EPA or states may still inspect from now until then due to tips, complaints, or site-specific regulatory or environmental considerations. During this period, EPA and the states encourage firms to conduct environmental compliance audits and to report significant violations of federal

environmental regulations to EPA, taking advantage of EPA's Audit Policy. Under this policy, EPA will reduce or eliminate the gravity-based portion of penalties, depending on whether some or all of the conditions of the policy are met. Facilities with less than 100 employees may take advantage of the Small Business Policy, which gives companies 180 days to come into compliance with no penalty provided certain conditions are met.

Inspections: EPA's New England office and the states are planning to conduct increased inspections, database review, and enforcement where appropriate of facilities in this sector in Connecticut, Massachusetts and Rhode Island beginning October 1, 1998.

For more information about this project call Roy Crystal of EPA-New England at 617.565.3281.

WHAT WOOD COATERS SHOULD KNOW

EPA's New England regional office is working with the Wood Products Manufacturing Association (WPMA) to help wood finishers understand and comply with environmental requirements. The following, the first in a series of articles on compliance and pollution prevention, appeared in the February issue of WPMA's newsletter.

Consider keeping records on the coating, gluing, cleaning and washoff materials you use. EPA recommends that every wood furniture manufacturer calculate his "potential to emit" hazardous air pollutants, and keep this calculation at his facility, since each facility's status under the NESHAP (National Emission Standards for Hazardous Air Pollutants) depends on its potential to emit. To avoid having to actually comply with the NESHAP, most wood furniture manufacturers will need to keep certain records to "prove," in case an EPA or state inspector should come knocking, that they qualify for one of its exemptions. To take advantage of some exemptions, wood coaters should have started keeping records as of December 1997, but starting now is better than waiting! To get a decision tree to help you determine your potential to emit, as well as information on the exemptions available and how to keep records to prove your status and avoid unnecessary costs, contact Janet Bowen or Abby Swaine on EPA's Assistance Line at 1.800.906.3328.

MARK YOUR CALENDAR

APRIL 6

Innovative Wastewater Technologies Trade Show

Marriott Hotel

Westborough, Mass.

8:00 a.m. to 4:00 p.m.

For engineers, public works officials, local planners and designers who are faced with remediating failed systems on severely constrained sites or with providing enhanced treatment. Sessions include an introduction to the N.E. review and evaluation framework for alternative technologies and company presentations on I/A systems. The audience will be able to view new technologies, talk with manufacturers' representatives and obtain information on product cost and performance. Registration fee \$20. For more information contact EPA's Center for Environmental Industry & Technology in New England at 800.575.CEIT (800.575.2348).

APRIL 8

Innovative Wastewater Technologies Trade Show

Marriott Hotel

Nashua, N.H.

See description for April 6.

APRIL 13

Risk Management Plan Workshop

Holiday Inn

Augusta, Maine

8:30 a.m. to 5:00 p.m.

For small businesses, local and state emergency planning commissions (LEPC and SERC), federal, state and local program personnel, the public sector (including water treatment plant employees), and emergency response personnel. Small business and industry reps may attend only if sponsored by their LEPC or SERC. The course will cover regulation applicability, plan development and review, and a case study of a Risk Management Plan, among other topics. Free. Sponsored by EPA. For more information call 617.565.9348 or 617.565.9232.

APRIL 15

Risk Management Plan Workshop

Springfield Fire Department Training Center

Springfield, Mass.

See description for April 13.

APRIL 16

Risk Management Plan Workshop

Department of Transportation

Newington, Conn.

See description for April 13.

APRIL 17

Risk Management Plan Workshop

Department of Environmental Management

Providence, R.I.

See description for April 13.

APRIL 28

Acids and Bases: Reducing Cost and Waste

Holiday Inn

Mansfield, Mass.

8:30 a.m. to 3:00 p.m.

For industries that use acids and bases in their production or waste treatment process. Topics cover an overview of state and federal regulations and sessions on process controls, water systems/wastewater treatment and water conservation. Free. For more information contact Bill McGowan, Mass. Office of Technical Assistance, at 617.727.3260, x 682.

MAY 12

Acids and Bases: Reducing Cost and Waste

Dedham, Mass.

Call for location.

See description for April 28.

MAY 18

Risk Management Plan Workshop

U. S. Environmental Protection Agency

Boston, Mass.

See description for April 13.

MAY 19

Acids and Bases: Reducing Cost and Waste

Sturbridge, Mass.

Call for location.

See description for April 28.

JUNE 4

Stormwater Technologies Trade Show

Hyatt Regency Hotel

Cambridge, Mass.

8:00 a.m. to 3:30 p.m.

For business and facility owners/managers, engineers, planners and local decision makers who need to develop and implement stormwater management plans. The audience will be able to view new technologies, talk with manufacturers' representatives and obtain information on product cost and performance. Registration fee \$30. Sponsored by EPA. For more information contact EPA's Center for Environmental Industry and Technology in New England at 800.575.CEIT (800.575.2348).

WHAT YOU NEED TO KNOW ABOUT THE RISK MANAGEMENT PROGRAM

On June 21, 1999, companies and municipalities that use certain listed chemicals will, for the first time, submit plans to EPA that detail how they will prevent accidental chemical releases from occurring. The type and quantity of chemicals that you use will determine if you are affected, rather than the size of your facility. Chemicals (a.k.a. the "regulated substances") covered by this new regulation include propane, ammonia and chlorine that many small businesses and municipalities commonly use and store.

What is the Risk Management Program?

The Clean Air Act required EPA to set up a program focusing on chemical accident prevention. This new program builds upon the chemical safety work under the Emergency Planning and Community Right-to-Know Act (EPCRA) which requires state and local governments to properly plan for and respond to chemical accidents. The new Risk Management Program focuses on prevention of these accidents, not just preparation and response.

You will likely be required to comply with the Risk Management Program if you use any of the 200+ regulated substances in quantities that meet certain thresholds. Even if you are a small business, you may be using common hazardous chemicals in quantities great enough to cause harm in the surrounding community if there were an accident.

Where Can I Get Help?

To find out whether the chemicals you use are RMP-covered substance and trigger thresholds call EPA's hotline, toll-free, at 1.800.424.9346 or EPA's New England office at 617.565.9348. Five one-day Risk Management Plan compliance assistance workshops will be held in New England in April and May. Please refer to the Calendar section of this bulletin for dates, locations and registration information. And, EPA's Chemical and Emergency Preparedness and Prevention Office's website (www.epa.gov/swercepp/) provides one-stop shopping for RMP publications and updates.

Thresholds for some common chemicals are:

- ☛ chlorine: covered if you exceed 2,500 pounds;
- ☛ ammonia: covered if you exceed 10,000 pounds; and
- ☛ propane: covered if you exceed 10,000 pounds (2,500 gallon water capacity tank).

OK ... So What's the Good News?

As a result of good business practices, you probably have some of the information you need to fill out your Risk Management Plan (RMP) or you may already have in place some elements of the program. Here's a list of programs and processes that are likely to be included in your RMP and that you already have implemented in the course of doing business (and will not have to duplicate):

- ☛ employee training on operating procedures for equipment;
- ☛ compliance with OSHA's hazard communication standard;
- ☛ maintenance programs for equipment and processes (in accordance with industry standard practices);
- ☛ safety information found on MSDS sheets that you are required to retain;
- ☛ documentation of equipment that you have (most likely given to you by the vendor upon purchase); and
- ☛ accident investigation procedures mandated by your insurance company.

P2 TECHNOLOGY TEMPLATE NOW AVAILABLE

Are you a manufacturer wondering what are the right questions to ask a vendor about a pollution prevention technology they're trying to sell you? Are you a consultant who would like to be able to compare apples and apples instead of apples and oranges when debating which of two technologies to recommend to a client?

EPA's New England office now has a product that can help you understand your choices and make decisions: a Pollution Prevention (P2) Technology Application Analysis Template. The Template consists of a series of questions that you should answer when evaluating and comparing P2 technologies. The questions address design, performance, cost, regulatory issues, experience record, lessons learned from previous applications, and how they compare with traditional technologies. Stone and Webster Engineering has piloted the Template on two technologies (PolyIonix and SolmeteX).

EPA and Stone and Webster will hold a workshop this summer to bring potential users together to learn about the Template and to discuss how to promote it. Call Abby Swaine of EPA's NEEATeam at 617.565.4523 for a copy of the Template, the pilot case studies, and/or to talk about coming to the workshop!

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To be added to the *Pollution Prevention & the Bottom Line* mailing list or to notify us of a change of address please contact the NEEATeam at the phone/fax numbers or address listed above or send an e-mail message to:

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Pollution Prevention & the Bottom Line is now available on the 'net. The address is <http://www.epa.gov/region01/steward/neeat/>



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